

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	CONSENT MOTION FOR
- v. -	:	MODIFICATION OF BOND TERMS
	:	AND RELEASE CONDITIONS
RONALD BAUER,	:	
	:	22 Cr. 155 (PAE)
Defendant.	:	
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**CONSENT MOTION FOR MODIFICATION  
OF DEFENDANT’S RELEASE CONDITIONS AND BOND TERMS**

Defendant Ronald Bauer, by and through undersigned counsel, respectfully requests that, contemporaneous with entry of a guilty plea at the Rule 11 hearing scheduled for November 4, 2024, the Court enter an order continuing the conditions of release that have been in place since Mr. Bauer’s initial appearance and arraignment, with the exception of the following modifications to his bond security and travel restrictions:<sup>1</sup>

1. To the extent the real property of Martha Bauer presently is securing Mr. Bauer’s bond, that security may be replaced with the net cash proceeds that Martha Bauer receives from a bona fide sale of that real property in an arm’s length transaction.

The encumbrance that the United States placed on that real property in or about April

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<sup>1</sup> Undersigned counsel’s understanding is that the government is not seeking to remand Mr. Bauer after entry of a guilty plea. Mr. Bauer’s record of compliance with his conditions of release, his consent to extradition from the United Kingdom, and his personal and family circumstances (among other things) are more than sufficient to show by clear and convincing evidence that he is not a risk of flight. *See* 18 U.S.C. § 3143(a)(1). This is true even with the release and bond modifications sought by this motion. Counsel for the government authorized undersigned counsel to file this motion as a consent motion.

2024 shall be deemed removed and extinguished upon such a sale of the real property, provided that the net cash proceeds of that sale are not remitted to Mrs. Bauer but instead are paid to the IOLTA account of Aaron Katz Law LLC with direction to remit those net cash proceeds to the Clerk of the Court.

2. To effectuate Mr. Bauer's right to retained counsel through sentencing, the cash that presently is securing Mr. Bauer's bond shall be reduced from \$125,000 to \$75,000. The Clerk shall return \$50,000 of the present cash security for the sole and express purpose of enabling Mr. Bauer to pay defense costs he expects to incur through sentencing.
3. Mr. Bauer shall be allowed to travel to Ontario, Canada for the limited purpose of visiting his father's burial site and, in connection with such a visit, meeting with other members of his family (including his mother) or engaging in religious observance.
4. Mr. Bauer shall be allowed to travel to Italy for the limited purpose of securing or protecting against the involuntary dissipation of real property that may be used to satisfy any forfeiture order or any future civil fines or penalties that Mr. Bauer may incur.
5. Prior to engaging in any travel outside the United Kingdom, Mr. Bauer will provide notice and proof of itinerary (including lodging address) to the United States Attorney's Office, the Court, and, as applicable, Pre-Trial Services or the Probation Office.

As good cause for the foregoing requests, undersigned counsel states that Mr. Bauer poses no risk of flight or danger to the community. Mr. Bauer waived his extradition rights and consented to

his extradition from the United Kingdom; has complied at all times with all conditions of release both prior to and after his extradition;<sup>2</sup> and, as reflected in the plea agreement that the government submitted to the Court, has strong personal and family reasons to continue to comply with all conditions of release and appear for all Court proceedings.

Undersigned counsel has sought the United States's position on the above modifications, and the United States has authorized undersigned counsel to file this motion as a consent motion. The motion was also presented to Mr. Bauer's Pre-Trial Services officer, who has no objection to the motion.

Respectfully submitted,

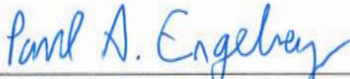
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DATED: NOVEMBER 1, 2024

**GRANTED.** The Clerk of Court is requested to terminate the motion at Dkt. No. 39.

SO ORDERED.

11/4/2024

  
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PAUL A. ENGELMAYER  
United States District Judge

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<sup>2</sup> Prior to Mr. Bauer's extradition, he was subject to release conditions imposed and overseen by the U.K. courts, as is not uncommon when a U.K. citizen is indicted by the United States and awaiting extradition. These conditions included strict travel restrictions and a form of home confinement. Mr. Bauer's compliance with these conditions was stellar.